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Subject: Round 2 Report - Initial Concerns
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Eric & Chip -

I don't have much to add to what Jim and Matt have already mentioned.

"Background". Let me add further emphasis to the need to be comfortable about background/upstream/regional chemical concentrations in sediment, surface water, and biota. If we have not collected the correct data, and/or are not applying the information correctly, we may be missing data gaps.

Localized Fish Data. The need for collecting additional data such as localized small mouth bass is really Dana's issue. But I can see that if the evaluation is focusing on site fish concentrations being, say, 10X background, then it might be worthwhile to show that in some areas the risk is 100X background. This becomes more important if the LWG is implying that cleaning up sediment won't help much because of upstream risks from surface water.

Subsurface Sediment. iAOPCs are defined using only surface sediment. We should look at how this overlaps with subsurface concentrations. We may not need any more data.

- Mike